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LaVA Project  
Medicine Bow National Forest  
2468 Jackson Street  
Laramie, WY 82070

*Submitted electronically to: <https://cara.ecosystem-management.org/Public/CommentInput?Project=51255>*

***RE: Comments on the DEIS for the Landscape Vegetation Analysis (LaVA) Project***

Submitted by Khale Century Reno, Executive Director, Wyoming Wilderness Association

The Wyoming Wilderness Association's (WWA) mission is to protect Wyoming public wildlands, including Wilderness, Wilderness Study Areas (WSAs), Inventoried Roadless Areas (IRAs), and other wildlands across Wyoming. Congress recognized the values of such areas when it passed the Wilderness Act in 1964, which protected designated wilderness and WSAs. The Wyoming Wilderness Act was passed by Congress twenty years later, in 1984, which designated four wilderness areas on the Medicine Bow National Forest (MBNF): Savage Run, Platte River, Huston Park, and Encampment River. Later, IRAs were identified on public lands nationwide, including 25 located on the Snowy Range and Sierra Madre units of the Medicine Bow National Forest. IRAs are an important part of public wildlands, but they lack the rigorous protection of Wilderness and WSAs. WWA is concerned about the mechanical treatments, prescribed fire, and hand-thinning that may occur in IRAs if the Modified Proposed Agreement (MPA) is implemented.

WWA was heartened to note that the very large area affected by the MPA would not require additional permanent roads. The MBNF already has a higher road density than any other national forest in Wyoming, primarily because the mountains are relatively flat. This has enabled timber harvesting throughout the forest. Roads provide various benefits, but they also fragment wildlands for some wildlife and greatly reduce the potential for the wildland experiences that are now highly valued by our members and many others. Roads are also expensive to build and maintain. Up to 600 miles of temporary roads could be constructed during the next 15 years in the Snowy Range and Sierra Madre, which is startling, but the Draft Environmental Impact Statement (DEIS) indicates they would not be built in IRAs and the roads would be closed after three years. Presumably, revenue from timber sales and the other benefits that are anticipated during the three-year period justify the costs of building so many miles of temporary roads.

The extent of the MPA is justified by a conviction that timber harvesting and fuel treatments are required following the widespread beetle epidemic during the last 15 years. There is a sense of urgency because the abundance of beetle-killed trees, many now fallen, is believed to have created hazardous levels of flammability. As always, such problems are most severe in the Wildland-Urban Interface (WUI). Many dead trees have already been removed from such areas, such as campgrounds and along many well-traveled roads. The motivation for much of the MPA is to further increase **forest resiliency**. Forest resiliency can be defined as resisting or minimizing the severity and extent of future insect epidemics and wildfires, which includes recovering quickly from such disturbances. To achieve resiliency over a large enough area, the DEIS suggests that over half (54 percent) of the IRAs will be subjected to mechanical treatments, hand thinning, mastication of downed fuels, or prescribed fires. In addition, to achieve some level of resiliency there could be up to 148 square miles of even-aged management (clearcuts), 259 square miles of uneven-aged treatments, and 156 square miles of prescribed fire, mastication, and hand-thinning on the two mountain ranges.

Completing a DEIS of this nature, with cumulative impact assessment, is a complex, difficult undertaking. We appreciate that no temporary roads will be placed in IRAs, that all proposed activities in IRAs will require approval from the Regional Office (page 30), and that the public will have opportunities annually to provide feedback (Appendix A). However, the MPA is generally without specifics about where, when, and how treatments would occur. As such, this is an umbrella DEIS, with the specifics to follow. WWA cannot support it without answers to the following questions:

1. Considering that climate plays a larger role in determining wildfires than fuel management in montane forests, does the scientific literature support the idea that lodgepole pine and spruce-fir forests can be managed so they become significantly less flammable?
2. How have predictions about climate change during the 21<sup>st</sup> century influenced the MPA plan? This is not discussed in the DEIS.
3. What proportion of the Treatment Opportunity Areas (TOAs) is in the IRAs and what is the justification for thinking that treating IRAs is important for achieving forest resilience? Further discussion of the resiliency concept is needed, as it seems to be the primary motivation for treating IRAs.
4. A map that shows the location of each of the IRAs should be included in the Final EIS. WWA appreciates the additional scrutiny of IRA treatments by the Regional Office, but what criteria will the Supervisor use to decide if an IRA treatment is ready for scrutiny by the Regional Forester?
5. IRAs would be treated for up to 1,000 feet from the nearest road. What could this look like?

6. What specifically is proposed for Sheep Mountain? Considering the long history of Sheep Mountain as a wildlife refuge, we think specifics should be presented for this area.
7. Under what conditions will treatments be applied to forests adjacent to designated wilderness?

Answers to these question will assist WWA's Governing Council in deciding whether or not it is likely that our organization will be able to participate effectively in the Adaptive Management process outlined in Appendix A, in which annual feedback from interested and motivated stakeholders will influence how the Modified Proposed Action proceeds.

Thank you for considering our comments.